ID.date Date of interview
22/01/20

ID.start Time interview started
10:42:24

ID.endDate Completion date of interview
22/01/20

ID.end Time interview ended
10:56:15

ID.time Duration of interview
13.85

Start of new case

Q1 Does the draft guidance cover the relevant issues about the right of access?

- [x] Yes
- [ ] No
- [ ] Unsure / don't know

If no or unsure/don’t know, what other issues would you like to be covered in it?

Q2 Does the draft guidance contain the right level of detail?

- [x] Yes
- [ ] No
- [ ] Unsure / don't know

If no or unsure/don't know, in what areas should there be more detail within the draft guidance?

Q3 Does the draft guidance contain enough examples?

- ○ Yes
- ◉ No
- ○ Unsure / don't know

If no or unsure/don’t know, please provide any examples that think should be included in the draft guidance.

I am particularly interested in the section around clarifying a request and when the time scale can and can not be stopped. For example the guidance makes it clear that if there is a valid request the time scale cannot be stopped whilst clarifying and agreeing an approach. But also makes it clear that where it is unclear whether a SAR is being made or where it is unclear what personal data is being requested then the time period does not commence. I would appreciate examples / further information about when a request is not considered valid as it is not clear what is being requested, and therefore the time period does not start until it is clarified. Thank you,

Q4 We have found that data protection professionals often struggle with applying and defining 'manifestly unfounded or excessive' subject access requests. We would like to include a wide range of examples from a variety of sectors to help you. Please provide some examples of manifestly unfounded and excessive requests below (if applicable).

We use egress to communicate our SAR responses to applicants, which enables us to tell whether a disclosure has been opened. We have recently found some requesters who submit frequent requests do not even look at their disclosures. They submit subsequent requests, submit complaints to the ICO. We believe it is clear that where the request was not opened they were never interested in verifying the lawfulness of the processing, rather to cause disruption.

Q5 On a scale of 1-5 how useful is the draft guidance?

1 - Not at all useful	2 – Slightly useful	3 – Moderately useful	4 – Very useful	5 – Extremely useful
○	○	○	☑	○

Q6 Why have you given this score?

It covers the aspects of the legislation which I would have expected to see. The guidance is clear and useful.

Q7 To what extent do you agree that the draft guidance is clear and easy to understand?

Strongly disagree	Disagree	Neither agree nor disagree	Agree	Strongly agree
○	○	○	☑	○

Q8 Please provide any further comments or suggestions you may have about the draft guidance.

The right of access is there to verify the lawfulness of the processing, where it is clear that a request is being made for other purposes, could this ever be considered as not being a valid request? Could any examples be included?

Q9 Are you answering as:

- ( ) An individual acting in a private capacity (eg someone providing their views as a member of the public)
- ( ) An individual acting in a professional capacity
- (✓) On behalf of an organisation
- ( ) Other

Please specify the name of your organisation:

manchester metropolitan university

What sector are you from:

higher education

Q10 How did you find out about this survey?

- ( ) ICO Twitter account
- ( ) ICO Facebook account
- ( ) ICO LinkedIn account
- ( ) ICO website
- ( ) ICO newsletter
- ( ) ICO staff member
- ( ) Colleague
- ( ) Personal/work Twitter account
- ( ) Personal/work Facebook account
- ( ) Personal/work LinkedIn account
- ( ) Other

If other please specify: